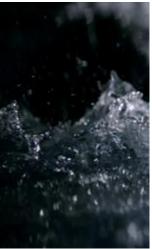








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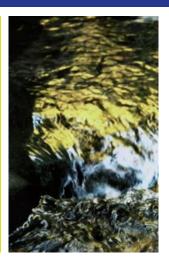
Immigrant integration in small and mediumsized towns and rural areas: local policies and policymaking relations

in Poland

Country Reports on multilevel dynamics



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REPORT https://whole-comm.eu

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Abstract

This report looks at multi-level governance dynamics and at the integration policies targeting post-2014 migrants developed by four small and medium-sized towns and rural areas in Poland. Primarily based on interviews conducted in each of the selected municipalities, it provides an overview of 1) national and regional integration policies targeting post-2014 migrants in Poland; 2) policymaking relations among the key actors involved in these policy processes in the 4 localities and key features of policy networks within which these actors interact; 3) how these actors perceive and define integration. The report finds that Poland has not yet created a nationwide integration policy, however, good practices are shared between different actors involved, leading to the rise of initiatives taken predominantly at the regional and local levels. No policies at the national level directly affects the funding of various public and private organisations dealing with the integration of migrants, leaving them with shortages of funds or with complete dependence on external funds (e.g., from the EU). With the majority of the labour migrants coming from neighbouring countries, the Polish government, emphasises on solely providing quick fixes like Polish language courses. Overall, at the national level, integration in some cases resembles the concept of assimilation, whereas, at the regional and local levels various actors appear to take the lead and form their own tailor-made integration policies. Medium-sized and small towns have developed several mechanisms to handle migration flows and integration programs, in contrast with rural areas, which are still struggling to employ similar practices.



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1. Introduction

Over the last few years, Poland has received unprecedented numbers of migrants and asylum seekers, often in an unorderly way. This has led to a growing number of migrants and refugees in scarcely prepared small and medium-sized towns and rural areas (SMsTRA). The way in which these local communities are responding to the challenges related to migrants' arrival and settlement in their territory is crucial for the future of immigrant integration in Europe. This is even more true if we consider that in 2022 these localities are again on the front line of refugee reception in Europe following the arrival of over two million of Ukrainians in Poland (ECRE, 2022).

This report aims to explore how 4 small sized towns and rural areas in Poland have responded to the presence of post-2014 migrants¹. In particular, it aims to assess, first, which policies have been developed and implemented in these small sized towns and rural areas, or, in other words, how have SMsTRA mobilized vis-à-vis the new challenge and in relation to the policies and funding schemes put forwards by other levels of government. In doing so, the project looks at the embeddedness of local actors in multilevel frameworks in which regional, national and EU policies and stakeholders may play a decisive role in shaping local integration policymaking. Second, the report focuses on the interactions between the actors involved in integration policymaking, asking: what different patterns of interaction can we identify between local (policy) actors and regional/national/supranational authorities and stakeholders? Which factors have led to the emergence of collaborations as well as tensions between actors at different government levels? Are new cooperative relationships eventually emerging and, if so, what are the key features of resulting policy networks? Third, the report asks how the actors involved in these policy networks perceive and frame the integration of post-2014 migrants, under the assumption that frames can play a key role in influencing policymaking processes.

In these localities – which differ in terms of their size, the political affiliation of their local government, their experience with cultural diversity, their economic and demographic

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¹ The group of migrants that arrived in (Western) Europe after 2014 is very heterogeneous, "but mostly comprises migrants that left from areas of political and humanitarian crises" (Working Paper 1 2021, 1-2). The majority of 'post-2014 migrants' entered thus as asylum-seekers but may have obtained different legal statuses by now (see for more detail Working Paper 1 for the Whole-COMM project).



situation and that are located in different regions — a total of 23 interviews have been conducted with actors involved in local integration policymaking, including members of local government, local officials, street-level bureaucrats' local councilors and a wide range of non-governmental actors. Insights derived from the interview material have been complemented with an in-depth analysis of policy and legal documents.

The report crucially finds that Poland has transitioned from an emigration to an immigration country. After the country's accession into the EU in 2004, a large number of Poles left the country to find employment elsewhere. The turning point was in 2008-2009, when the country proved resilient to the financial crisis. This led to an inflow of labour migrants from neighbouring countries. Coupled with low unemployment rates and labour shortages in multiple sectors with construction, hospitality and agriculture to be the most prevalent; the Polish government decided to introduce the Declaration on entrusting work to a foreigner in 2019. This declaration applies only for citizens of Armenia, Belarus, Georgia, Moldova, Russia and Ukraine. This is a simplified procedure where the Poviat Labour Offices are responsible to receive the declarations. Even though on the national level migration seems to be essential for financial reasons, the Polish government does not place equal importance to the integration of migrants. No integration policy exists as of now along with budget for integration programs. For refugees there are couple of programs but they do not apply for labour migrants. With increased numbers of migrants across the country, small towns and rural areas also received labour migrants. For those reasons regional and local actors, enacted with joining the declaration of cooperation in the field of migration, offering them dialogues and exchange of good practices for the integration of migrants. These sudden changes in the country considering migration flows have left some actors with a confusion between the concepts of assimilation and integration and other actors with a leading role at the local levels.

The report is organized as follows. It describes the methodology (2) that was followed for the fieldwork of this research. The reasons behind the selection of the four localities and several burdens faced during the collection of the empirical data. In this section, it is explained the Type A to D localities and why the authors categorised the selected localities as such.

Then the national context (3.1) follows, where national migration policies are explained along with legal documents and the stance of the Polish government considering migrants and refugees and the equivalent stance taken from regional and local levels along with public and private stakeholders. Afterwards, the local cases (3.1.1) are described and the reception of migrants, demographics and the local integration policies and practices.



The development of the integration policies follows (4), with the analysis of electoral campaigns, debates based on migration, labour migration laws and segments from the interviews mentioning good and bad practices in the selected localities.

This is followed by the frames of integration (4.1) where discussions between the stakeholders are analysed along the perceptions of the host community towards migrants and refugees.

This Report is a deliverable of the Whole-COMM Project, which focuses on small and medium sized municipalities and rural areas in eight European and two non-European countries that have experienced and dealt with the increased arrival and settlement of migrants after 2014 (for more information about the project see: Caponio and Pettrachin, 2021).

Scientific Objectives			
To address the gap between research focusing on local integration policy and structures of support on the one hand, and research focusing on integration as a social process taking place at the level of individual migrants' attitudes and relations on the other, in order to advance a more realistic and sophisticated theorisation of the link between immigrant integration policies and their impact on local communities and on immigrant trajectories			
Scientific Objective 2	To push forwards theorisation of the local dimension of migration in a) its multiple facets from policy to politics, attitudes and social relations; and in b) still underresearched local contexts, i.e., small and medium-sized towns and rural areas (SMsTRA)		
Policy Object	ives		
Policy Objective 1	To provide targeted support to SMsTRA in the field of migrant integration policies through co-creation of innovative approaches		
Policy Objective 2	To sensitize and promote reflection around the specific challenges faced by SMsTRA in integrating post-2014 migrants among policymakers and stakeholders operating at different territorial scales		
Policy Objective 3	To explore the conditions for policy learning and transferability of policies and practices of integration of post-2014 migrants across the Atlantic		

Table 1: Whole-COMM specific objectives



2. Methodology

Empirical data for this report was collected in the period October 2021 until April 2022. Data collection comprised document analysis and semi-structured qualitative interviews with respondents at the local, regional/provincial, and national level. Potential respondents were sampled based on their (professional) positions, e.g., as local official working on integration in a municipality or employee in an NGO offering non-profit services to refugees. Most respondents were contacted through email first (usually in Polish), occasionally followed by a reminder and a call. After establishing first contacts in a municipality, other respondents were identified using the method of 'snowball sampling' (Bryman, 2016). In total, 23 interviews with 23 respondents were conducted. For the Polish case, two methodological challenges occurred. The first methodological challenge had to do with the common questions that all partners of WP3 had to follow for comparative purposes. In some localities, especially at the rural area even though they actively have migrant residents and workers, the concepts of integration and housing services are not very common to the participants. Integration is seen as a fragmented topic and housing is mostly taken care of by private housing or real estate agents. More specifically, each service provider or NGO are working on tasks, which are not necessarily a chain of actions or a contribution to the entire picture of the integration of migrants in the country. Hence, in some cases the interviewees had a hard time to respond to the questions as they do not see themselves as involved in integration policies and practices but rather enactors of one part of it. Moreover, Poland is a country, which was primarily an emigration state with people migrating in large numbers till 2004, it is only the past fifteen years that the country is experiencing a transformation into an immigration state. While, these changes are inevitably becoming a reality in Poland, some actors from municipalities are not yet comfortable to lead discussions regarding the topic of integration. Another methodological challenge was for them to participate in the interviews in general, as stakeholders from larger cities are familiar with interviews about their work and are slightly more self-aware of each practice contributing to the newcomer's settlement, whereas smaller town and rural areas representatives are rather reluctant to be recorded and discuss openly about sensitive topics like this of migration.

In Poland, migration is a heated topic and a very politicized one, it is also a rather new topic, which translates to the fact that people, who are actively working with migrants are easily recognizable in their communities. Due to this the anonymization of the localities and their names helped the participants to feel comfortable with sharing information and their experiences.



The four localities on which this report focuses were selected based on several different variables. All localities hosted a reception centre for asylum-seekers or refugees between 2014 and 2017 and were still hosting some post-2014 migrants in late 2021. Case selection was conducted in the framework of the broader Whole-COMM project (see Caponio and Pettrachin 2021 for more details) in order to maximize variation among a set of variables including: population size², the share of non-EU migrant residents before the arrival of post-2014 migrants, unemployment levels before the arrival of post-2014 migrants, demographic trends before the arrival of post-2014 migrants, the political parties in government (conservative vs progressive). Some of these variables were additionally used to identify **four** types of localities:

Туре	Characteristics	Selected cases in Poland
Type A ("revitalizing/better- off" locality)	Recovering local economy and improving demographic profile, migrants' settlement before 2014	Municipality A = medium size towns
Type B (locality "in transition")	Improving economic and demographic situation, no remarkable arrivals of migrants before 2014	Municipality B = Small town Province Greater Poland, region: West Province Lower Silesia, region: South- West
Type C ("marginal" locality)	Demographic and economic decline, migrants' settlement before 2014	Municipality C = Small town
Type D ("left- behind" locality)	Economic and demographic decline,	Municipality D = Rural area Province Greater Poland, region: West

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² The Whole-COMM project distinguishes between medium towns (i.e., provincial/regional capitals with between 100,000 and 250.000 inhabitants), small towns (i.e., localities with between 50,000 and 80,000 inhabitants that are either provincial/regional capitals within rural regions/provinces or do not have any administrative function) and rural areas (i.e., localities with less than 30,000 inhabitants and a low population density).



	no remarkable arrivals of migrants	
	before 2014	

In Poland, 4 cases were selected. To ensure regional variation, the 4 selected communities are distributed across 2 provinces, namely, the Greater Poland region and Lower Silesia.

In the case of Poland, it is worth giving a context of the post-2014 migration and long-term residents. Poland has recently transitioned from an emigration to an immigration country. The country has limited years of continuous migrant flows and experiences with migration and integration. Therefore, it still works on finding effective policies regarding migration and integration of migrants and refugees. After the financial crisis of the 2008-09, Poland remained rather stable, showing to its neighbouring countries that it can be a trusted destination for labour migration. From that point on, labour migration was frequent in small amounts with a high peak in 2014 after the annexation of Crimea in Ukraine. Ukrainian migrants and refugees came in larger groups, which started to formulate a consistent migration flow into the country. Hence, comparing to other EU states, in Poland post-2014 immigrants are quite prevalent due to geopolitics in the region. That does not mean that they are instantly recognizable in the community, but it became a turning point in the migration scene in Poland.

For the Polish case, four localities were selected. Two of the localities, demographically can be categorised as a small town and as a Type A according to the economic characteristics and the inflows of migrants. Two other localities fall under the category of rural areas and are closer to a Type B locality with mostly post-2014 arrivals of migrants.

Poland's administrative division introduced in 1999, includes the voivodeships, which are large administrative units, in other countries similar to administrative units for each province. There are in total 16 voivodeships across the country. These are crucial for migrants as they are the places, where migrants should submit all the requested, from the Polish government, paperwork for residence permits, work permits and others. Voivodeships represent mostly the regional level regarding migration and integration. Then poviats are local administrative units, corresponding to a county in other countries. These units are having information for the places of residence of the migrants, numbers of low and high skilled workers in the county and employment contracts for migrants provided by the employers, they are representing the local level. Gmina might be compared to municipality, three or four Gmina together can form a Poviat. They also represent the local level in migration, also for integration programs and practices. (Statistics Poland, 2022). Each administrative unit is important for different actions and includes different stakeholders. Voivodeships are the prime locations for migrants in Poland as they are the only ones, which issue residence permits. Considering the type and population sizes of the selected localities and the different levels involved, different



stakeholders were contacted and participated in the fieldwork. The fieldwork conducted includes twenty-three public and private actors, NGOs, journalists, experts in migration, service providers and school employees. Most interviews were conducted in person, apart from some, which were primarily with experts and journalists, who in some cases were having a very busy schedule for an in-person meeting.



Provinces where the fieldwork took place



3. National context

For many years Poland has been considered a country of emigration, this tendency only intensified by Poles leaving after the country's accession into the European Union (EU). Taking advantage of the freedom of movement after 2004, Poles searched for employment in other Member States primarily Germany and the UK (Anacka M and Okólski, 2008). The scale of the outflow from Poland exceeded the scale of the inflow, substantially. However, this does not mean, that after 1989 in Poland, migrants, from neighbouring countries, did not settle or start temporary employment. Estimated data show that after Poland accessed the EU, as many as 2 million Poles left the country. The greatest outflow has been recorded between the years of 2004 – 2007, since 2011 a decrease in the outflow from Poland has been recorded. As Duszczyk (2012, p.149) claims that was related to 'the exhaustion of the emigration potential of Poles and economic convergence within the community'. Such a dynamic outflow from Poland did not coincide with a dynamic influx of migrants in the first years after Poland became an EU Member State. There was a systematic increase in the numbers of migrants applying for the right to stay in Poland, but the scale of the phenomenon was much smaller than expected. A change in the migration trends in Poland dates back in 2008 and 2009. This was since Poland remained rather unaffected by the financial crisis, which hit globally (Michał Gradzewicz et. al, 2014). This showed that Poland had stabilised its economy and had economic potential for the future, which significantly caught the attention of labour migrants. In terms of the geographical distribution, migrants until 2014 mainly lived and worked in the Warsaw agglomeration and the Mazowieckie voivodship (county). It is only after 2014 that a clear intensification of the influx of migrants in Poland and a simultaneous geographical diversification in the settlement of migrants, can be noted. Amongst the migrants settling in Poland, citizens of Ukraine are the dominant group, other nationalities such as Indians, Pakistanis, Chinese, etc. are represented to a lesser degree. In the case of the influx of migrants in Poland, it is not only about the intensity of this process, but also about a significant differentiation of categories (e.g., seasonal workers, long-term workers, residents, students etc.). A particularly visible increase in numbers can be noted in the temporary and circular migration categories.

Such a large influx of economic migrants in Poland is associated with demand and supply factors. On the one hand, an improvement in the situation on the labour market, record-low unemployment led to this. Poland currently has 4.9 percent of unemployment (Statista, 2022). With the Euro area having an average unemployment rate at 6.8 % in March 2022, Poland scores lower than average, which makes it an attractive destination for neighboring countries (Eurostat, 2022). On the other hand, this process was also fueled by increasing demand for workers in sectors such as agriculture, services, construction, tourism, and industry. In terms of the development of the Polish economy, it recorded a steady growth of over 5% during 2004-2018. During the same years, the growth in the EU was recorded at 1.6%. As Poland did not experience the economic recession in 2008 – 2009, which affected other EU countries in a great degree, showed a significant change of the country prior 2004 and fostered migration inflows rather than outflows (GUS, 2017). In 2018, the GDP of Poland was



5.1% and was the highest result recorded in the past 11 years (Kaczmarczyk, 2018). Economic development contributed to a decline in unemployment from 6.1% in 2016 to 3.5% in 2019 (OECD, 2019). The **Covid-19 pandemic impacted the economy somewhat, with an increase of unemployment almost at 2%**. This had also an impact on integration practices with limited services provided and with the legalisation of the papers of some employees. In other words, in Poland, for seasonal workers, employers offer contracts based on the *Article 88 (2) of the Act of 20 April 2004 on employment promotion and labour market institutions (seasonal work), for the entity temporary entrusting work performance or for another entity entrusting work performance*. The temporary permit mentions that the employee can work up to 9 months from the day of entry in the country. In some cases, during the pandemic, employers led off foreign workers. This resulted with **migrants being with no legal documentation** during a pressing period of a global pandemic as their right to work in the Republic of Poland is linked to a sole employer.

The outflow of workers because of post-accession migrations had clear repercussions on the Polish labour market. Estimated data on the outflow from Poland in 2005 – 2012 states that it was about 2.25 million (Kołodziejczyk, 2016). When it comes to supply factors, the economy being unstable and the turbulent political situation in Ukraine resulted in large outflows of migrants. As a result of such an intensive influx of migrants in Poland, a geographical change in terms of their settlement can be noted. **New attractive places for migrants to settle have emerged (Kraków, Wrocław, Gdańsk, Łódź),** in addition to the traditional ones, which used to be Warsaw and the Mazowieckie voivodeship (Górny and Śleszyńsk, 2019)

A landmark in the migration policy in Poland started in 2015 with the introduction of the system of work permits, a regulation coming from the Ministry of Labour and Social Policy, which is currently one of the main instruments of migrants' access to the labour market. In the Polish case the procedure has been greatly simplified with the *declaration of the intention* to entrust work to a foreigner system. This system allows entrepreneurs to employ migrants without needing to apply for a work permit and enables employment of migrants in sectors struggling with high demands for employees. However, this provision does not apply for seasonal and circular work. As Duszczyk (2012, p. 149) emphasized, 'before the introduction of the declaration system, in the years 2004 - 2006 the interest of employers in legally employing seasonal foreigners was marginal'. The procedure allows employers to recruit foreigners for a period not exceeding 6 months within 12-month period, based on the declaration. Citizens of Armenia, Belarus, Moldova, Russia, Georgia and Ukraine are allowed to use the simplified procedure for accessing the Polish labour market. That declaration does not apply for other third-country nationals, though. The declaration states, "The declaration of entrusting work to a foreigner entitles to perform non-seasonal work for up to 6 months during consecutive 12 months" and the employer is obliged to have a written agreement with the employee, where the foreign workers is entitles at least the minimum wage of PLN 2,250.00 gross (Department for foreigners, 2022).



In Poland, policies related to migration are linked to regulate the applications for granting refugee status and allow employment for recognised refugees. Asylum seekers who are accepted into the procedure are granted residence visas and are allowed to stay in the refugee centers. Considering the refugees, currently housing facilities, employment and access to social services are still some of the biggest challenges. The Ministry of Labour has not yet established a systematic way of assisting individuals with a refugee status. Moreover, an integration policy has never been formulated, although some integration activities related to refugees and beneficiaries of international protection were implemented as part of the asylum policy (from 2004). What came closer to an integration policy measure was the Individual Integration Program (IIPs). There programs initiated in 2008 and terminated in 2015. These programs offered to individuals, who underwent some personal assessments before deemed eligible for, assistance with housing, finding a job, help with local institutions and local community, Polish language courses, driving courses, support for women with small children, support with psychologists, nurses, career advisors and assistance with labour law. The programs were co-financed by the European Union through the European Social Fund, under the Human Capital Operational Programme (European Commission, 2015).

It is important to point out from the example of the aforementioned programs that all the attempts to develop and implement integration activities have been promoted by NGOs rather than public institutions. Considering that there is no concrete nationwide integration policy, public institutions are not responsible to act and have integration programs. This creates a scenery of fragmented integration activities and projects, which are implemented by NGOs and their implementation is possible only due to the EU funds available for migrants' integration. Hence, the local level resorts with collaborations with the transnational level for the coverage of local needs.

The development of migration policy in Poland can be divided into two phases. The first was related to the implementation of international conventions (UN Refugee Convention), bilateral and multilateral agreements related to the international protection of people in need. The second phase is followed by the Europeanisation of migration regulations (2001-2004), and it might be characterised by the first attempts of institutionalization and introductions of regulations. This process was not caused by the inflow of migrants and related to these challenges, rather was driven by external factors, such as the adaptation to the EU requirements. In terms of integration regulations, the first phases were seen as rather ad hoc humanitarian actions. All the developments were related to the support of people in need, rather than long-term integration activities. From the very beginning the lack of regulations in integration policies, as well as the lack of designated public institutions, created a situation, where NGOs played the main role in this area, focusing first on assisting refugees and asylum seekers, and subsequently providing services for other categories of migrants.

The important phase in integration activities started when Poland acquired access to European Funds (European Refugee Fund and European Fund for Integration of Third-Country Nationals) dedicated to migration and integration activities (Matusz-Protasiewicz,



2014). These funds were the main source of financing in the field of integration in Poland State budget for integration purposes is given for the sector of education, which affects foreign children and for the trainings of teachers, who receive in their classrooms children with migration background. Also, local budgets exist for the support of NGOs and private organisations. For instance, the European Belarus" Foundation in Warsaw is funded by a local budget, assisting with intercultural events between Belarusians and Poles. The last period (from 2015) of migration and integration policy was related to high level of politicisation of this topic, which started in the parliamentary campaign and reflected on the migration crisis in the EU. The Asylum, Migration and Integration Fund (AMIF) was meant to replace the European Refugee Fund (ERF) that ended by 2013 and the European Fund for the Integration of Third—Country Nationals (EIF) that ended by 2020. However, access to AMIF was delayed in Poland. The call for application in 2015-2016 was blocked by the Polish government, which strongly impacted the incomes and the survival of NGOs collaborating with migrants. Some organisations were forced to end their services and others minimised them (Matusz, 2020).

If it comes to the development of migration policy as such, and integration policy, in particular, during the course of 20 years there were **two documents**, **that required attention**. The governmental **strategic document "Migration Policy in Poland- Current state of Play and Further Actions"** [Polityka migracyjna Polski- stan obecny i postulowane działania]. This document was developed by the inter-ministerial Committee for Migration and was adopted by the government. This supposed to be the starting point for development of law regulation and the framework of institutions responsible for migration and integration policy. The main goals of integration were defined as:

- 'Adopting comprehensive solutions regarding the integration of foreigners remaining outside the international protection system (regime), including the possibility of obtaining Polish citizenship,
- adopting the principle of determining integration policy at the central level, assuming that integration activities are carried out at the local level,
- enhancing the role of local governments, in the integration of foreigners (Migration Policy in Poland 2011, pp.18-19).

It is important to add that this strategic document was based on a consultation with experts, NGO representatives and local institutions. After the elections in 2015, the new government of the Law and Justice (Prawo i Sprawiedliwość) annulled this document in 2016. From that moment on, migration and integration remained without any strategic document, there was no explicitly formulated framework for cooperation and integration activities. At that time, the influx of labour migrants in Poland had already profoundly increased, and this process opened a new challenge for the local authorities. The local authorities decided to act and initiate the declaration of cooperation in the field of migration, signed by the presidents of twelve Polish cities. The declaration underlined the willingness of exchange of ideas and good practices among the cities participating. The cities declared the importance of cooperation



with both international organisations such as International Organisation of Migrants (IOM) and United Nations high Commissioner for Refugees (UNHCR), as well with experts and local NGOs working in the field of integration.

The Law and Justice government announced in 2017, the work on another strategic document on migration, called the "Strategy for Responsible Development" (Uchwała nr 8 Rady Ministrów), which envisaged the development of a new migration policy. The strategy defines a preference for migration of some groups, mainly coming from neighbouring countries, which in the opinion of the authors are culturally close to Poland. According to the document, this cultural proximity should enable migrants coming to Poland to have a smooth integration and assimilation (Uchwała nr 8 Rady Ministrów, p. 128). It is not the first official document, in which integration and assimilation as concepts are used interchangeably and as synonyms. The Law and Justice government has expressed the need for influx of foreign workers to the Polish labour market, and their role to address the demographic challenges such as low birth rates, aging population etc. As a result of this strategy development, "Poland's Migration Policy" (MSWIA, 2019) document was published in June 2019, receiving strong criticism by researchers, experts and NGOs. The objective of this document was to emphasize on issues related to security and public order. In the document, migration was seen as necessary, but at the same time as a threat to the public order. The document was criticized for its errors (in understanding and defining categories of migrants and processes linked to migration), stereotypes and prejudices. The role of migrants in this document was limited to the labour market. Integration policy is defined as a part of broader migration policy. The authors support the concept of assimilation and reject a more multicultural perspective, namely, it is mentioned "integrated foreigner understands and recognizes the values in force in Poland, including ideological and religious ones, accepts them and treats them as their own and rejects values that would pose a threat to social cohesion and universal security in Poland' (Zespół do Spraw Migracji, 2019, p. 38).

Overall, Poland has **not developed a long-term, strategic document on integration policy. Any activities** addressed for migrants are rather **fragmented, ad hoc, and reactive**. The key role for potential development and reassurance of the implementation of all activities related to migrants, as well as representation in the public discourse about integration is restricted to the work of the NGOs. The most institutionalized integration program are the IIPs for refugees, run by the public administration. The access to EU funds enabled the financing of integration projects not only for migrants related to forced migration but also for other groups, as third-country nationals. This experimental manner regarding integration initiatives is predominantly organized by NGOs with the financial support from EU funds. This was interrupted by the significant changes in the rules of financing projects mainly from AMIF, introduced by the Law and Justice government. The lack of access to EU funds, and the growing needs for integration policies and practices on the local level, pushed the local authorities to search for local resources for integration activities.



Since Poland does not have any comprehensive national integration policy, defined as public policy formulated at the governmental level targeting migrants of diverse categories, it means that there are no goals, tools and resources dedicated to integration. However, this does not mean that there is no discussion, exchange of some good practices, dialogues between key actors involved, there is a sort of a beginner stage of policy learning process, ad hoc integration activities and limited programs. From the semi-structured interviews, which were conducted for this project, it appears that the local authorities are getting more and more aware of their own local integration needs. "We know that this kind of huge inflow of migrants to our town, is going to change our community. We know that we should help our new inhabitants to become part of the town. My biggest concern is about our migrants leaving next to us. We don't want to have ghettos here. But there is no support from the central level, no strategic document, no budget. The government closes its eyes to integration. We welcomed so many migrants, because we need them, our economy needs them, and the government thinks that they are going to integrate by themselves" (PL-SWI-01).

The lack of comprehensive, explicitly formulated integration policy means that the fragmented integration activities are coordinated by various institutions on the central, regional, and local level.

These actors can be divided in some basic groups:

- **central level public institutions** such as Ministry of the Interior and Administration, Ministry of the Family, Labour and Social Policy, Ministry of Education and Science, Office for Foreigners, Offices for Foreigners in Governors Offices.
- **local level public institutions**, local administrations (poviat), family support centers, social support centers, local labour offices, schools (primary and secondary);
- **civil society organizations**, NGOs, private language schools, local community organizations, churches, and other religious organizations.
- intergovernmental and international organizations such as the EU offices, IOM, UNHCR etc.

All the actors are involved in the implementation of their own project financed from various funds, as well as in the public discourse about migration and integration. The integration activities took place on the local level, and were related to cultural events, language courses, legal support, psychological assistance, and housing support. An important role has the local schools and local authorities in the development and implementation of solutions for adaptation of foreign children to Polish school systems (welcoming classes, multicultural assistance) (Duszczyk et al., 2018; Matusz-Protasiewicz, 2014; Molęda-Zdziech et al., 2021; Okólski and Wach, 2020; Pawlak and Matusz-Protasiewicz, 2015; Wach, 2018, Matusz 2020).



Table 2: Integration laws and policies.

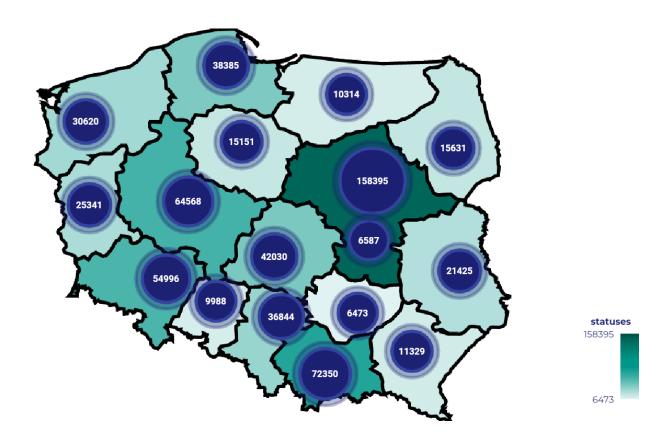
	RELEVANT LAWS	RELEVANT POLICIES	MAIN ACTORS INVOLVED	ROLE/ RESPONSIBILITY OF ACTORS	FUNDING
NATIONAL LEVEL	Participati on law		Ministry of Interior and Administration	Coordination, funding, policymaking	
	Chapter 5 of the Act on Social Assistance (2004)		Ministry of Education and Science	Education, system of adaptation of foreign speaking system	
			Ministry of Family, Labour and Social Policy	Reception of asylum seekers, Individual Integration Program (IIP)	
			Office of Foreigners	Legalisation	
REGIONAL LEVEL			Governor Offices	Legalisation (permits for stay and work)	
			Regional Labour Offices		
LOCAL LEVEL			Local authorities	Coordination/Education/Social support	
			NGO	Social support/education/leg al assistance	

3.1 Local Cases (Type A-D)

As mentioned earlier, until a few years ago, **Warsaw and Mazovieckie regions** played the most significant role as poles of attraction for migrants coming to Poland. However, the high numbers of migrants which came to Poland in 2014 and onwards started to be equally distributed across the country. The big agglomerations such as **Warsaw**, **Krakow**, **Gdansk**, **Wroclaw** remained to be important destinations, however, **even medium sized and small towns** in all regions of Poland attracted post-2014 migrants.



The four localities chosen for this project are in two different regions: Lower Silesia (capital Wrocław) and Greater Poland (Poznań), both in Western Poland. Both regions attract considerable numbers of migrants in the past five years. According to statistics both regions were in the first five regions in Poland with the highest numbers of migrants.



According to the Whole-Comm's project methodology, one of our localities can be categorized as Type A (Locality 3) and two as Type B (Localities 1 and 2) and a rural area (Locality 4) lingering between a Type B and C locality. Based on the Whole-Comm's typology of middle sized and small sized towns, two fall under the category of small sized towns and two under the rural areas. It must be noted that this is rather based on population density calculations. To understand better the migration pathways, it is important to add that two of the localities (Locality 1 and 4) are located in a close distance from large cities.



Table 3: Number of inhabitants in the localities.

Locality	Number of inhabitants	Region	Subregion	Distance from capital of the region
Locality1	56.800	Lower Silesia	Western Poland	50km
Locality2	15.900	Lower Silesia	Western Poland	28km
Locality3	71.560	Greater Poland	Western Poland	123km
Locality4	29.800	Greater Poland	Western Poland	13km

For the Whole-COMM project it is important to present statistics about migrants living in the localities. In the case of Poland, it is very difficult to present exact numbers, even predictions are highly unprecise, due to a very weak system of data collection. Data on migrants, their entry and residency status on the territory of the Republic of Poland are collected by various public institutions. These data are about various residence permits are very often inconsistent with each other; in most cases, they are mere estimations. Therefore, it is challenging to determine the precise number of migrants staying and working in Poland. Data on migrants are collected by the Border Guards (data on entries and exits), the Office for Foreigners (Polish abbr. UdSC), the Ministry of the Interior, the Ministry of Labour, the National Health Fund (Polish abbr. NFZ) and the Social Insurance Institution (Polish abbr. ZUS). Data on migrants are also collected by the Ministry of Education and Science. The differences in the statistics on migrants in Poland are illustrated in the Table 1, which presents data from various registers. According to the latest analysis of the Statistical Office (GUS) in Poland: 'The estimate uses the data on the size of the population of foreigners residing in Poland as of 31 December 2019, determined by the information on citizenship held by administrative registers. Nine registers were used to determine this size: PESEL, UdSC, ZUS, KEP, MRPiPS, MNiSW³, MEN⁴, KRUS and NFZ. The registers were chosen based on experts' opinions about the quality of the information and the qualitative parameters. The most reliable data sources were selected because they have consistent categories of units (persons), had variables that are key, both in terms of information included, as well as because of the integrity of their resources.' (GUS, 2020, p. 4)

³ MNiSW – the Ministry of Science and Higher Education

⁴ MEN – the Ministry of National Education



This study compared various data registers to forecast the most reliable numbers of migrants residing in Poland, based on various residence permits. The differences in numbers are presented in Table 4.

Table. 4: Number of migrants in Poland based on multiple registers.

Data Register	Number	
PESEL ⁵	263.976	_
UdSC	426.266	_
NFZ	1.230.717	_
ZUS	696.434	Sourc
MRPiPS ⁶	767.033	
KRUS ⁷	60.198	

Source: GUS 2020,

https://stat.gov.pl/obszary-tematyczne/ludnosc/migracje-zagraniczne-ludnosci/sytuacja-demograficzna-polski-do-roku-2019-migracje-zagraniczne-ludnosci,16,1.html.

For the data about migrants in Poland two data collections are important, number of declarations of the intention to entrust work to a foreigner registered by local labour offices and number of work permits. The number of declarations issued by the local authorities does not realistically depict the numbers of migrants living in a locality, but it shows the interest and influence in the local economy and the willingness of employers to employ migrants at this certain area.

The system of work permits known as the *declaration of the intention to entrust work to a foreigner* introduced in Poland is there to foster temporary work in Poland, in sectors struggling with a high demand for employees. In particular, in some of the selected localities, the towns became deserted after the fall of the Soviet Union. They used to be industrial centers during the Soviet Union, however, like a lot of other towns in Poland, they were abandoned as all the mining projects were nationalised during the Soviet times and with the administrative changes, they became redundant and run-down properties. Jaskułowski

⁵ PESEL – national identification number

⁶ MRPiPS – the Ministry of Family, Labour and Social Policy

⁷ KRUS – the Agricultural Social Insurance Fund



(2019), discusses the importance of the newcomers and their impact on the local economy as these localities faced demographic decline with more death rates than birth rates. These types of localities were in extreme need of migrants who are willing to work in factories. Essentially whole localities were revived financially by the presence and work of migrants. This was very much fosters by the simplified system of the declaration for employment, this declaration shall be submitted at the district Labour office, meaning that most paperwork related to work permits is the responsibility of the local level.

The introduction of this simplified procedure opened the door for temporary migration in Poland and intensified the dynamic inflow of primarily, Ukrainians. As mentioned before, this simplified procedure is only for certain nationalities, which means that it does not represent the entire migration scene in Poland, however, due to the high numbers of migrants arriving from the countries linked to the declaration, Polish administrative units are mostly familiar with the cases linked to the declaration. Many temporary migrants working in Poland based on the simplified procedure are not included in the statistics of work permits. In the last 3 years many of the temporary and cultural migrants decided to stay in Poland. This process impacted the family reunification and the increased number of migrant children in local schools.

Table.5: Number of declarations of intention to entrust work and number of work permits in 2021.

Locality	Number of declarations of the intention to entrust work to a foreigner issued by the local Labour office (number of Ukrainians)	Number of permits to work in the region issued by the Governor Office
Locality 1	28.952 (24.953)	44.579 (Lower Silesia)
Locality 2	8.669 (7.667)	44.579 (Lower Silesia)
Locality 3	4.837 (4.045)	74.558 (Greater Poland)
Locality 4	93.378* (75.002)	74.558 (Greater Poland)

Own elaboration based on Ministry of Family, Labour and Social Policy, April 2022.

The table above presents the number of declarations of the intention to entrust work to foreigner issued by the local labour offices (Powiatowy Urząd Pracy) and the number of all types of permits to stay issued by the Governor Offices in the given region.

^{*}In terms of local labour office, locality 4 belongs to the labour office located in the capital of the region, its why the numbers are much higher as in other localities.



Table.6: Number of all types of residence permits to stay April 2022

Region	Number of residence permits*	Ukrainians	Women	Men
Greater Poland	49.430	38.553	29.163	20.267
Lower Silesia	42.672	37.080	18.495	24.177

Own elaboration.

Other source of information about migrants living in the locality is the number of foreign speaking children in local schools. In the last 5 years the number of migrant children in schools, in the beginning in big cities such as Warsaw, Gdańsk, Wrocław, Poznań, Cracow, increased from very few to thousands. The latest available date from September 2020 on foreign speaking children in local schools indicated for big cities: Warsaw 16.055, Wrocław 7.326, Kraków 6.082, Gdańsk 3.325, Poznań 3.764. In the last 2 years there was an increase of migrant children also outside of big cities, in medium- and small-sized towns. The table below presents the number of foreign speaking children in local schools in the localities of this project (SIO, 2020).

Table.7: Number of foreign speaking children in local schools by the end of 2020.

Locality	Number of foreign speaking children in local schools (2020)
Locality 1	277
Locality 2	192
Locality 3	112
Locality 4	198

Own elaboration based on the System Informacji Oświatowej <a href="https://dane.gov.pl/pl/dataset/1426,liczba-uczniow-cudzoziemcow-wedug-gmin/resource/31180/table?page=1&per page=20&q=&sort="https://dane.gov.pl/pl/dataset/1426,liczba-uczniow-cudzoziemcow-wedug-gmin/resource/31180/table?page=1&per page=20&q=&sort="https://dane.gov.pl/pl/dataset/1426,liczba-uczniow-cudzoziemcow-wedug-gmin/resource/31180/table?page=1&per page=20&q=&sort="https://dane.gov.pl/pl/dataset/1426,liczba-uczniow-cudzoziemcow-wedug-gmin/resource/31180/table?page=1&per page=20&q=&sort="https://dane.gov.pl/pl/dataset/1426,liczba-uczniow-cudzoziemcow-wedug-gmin/resource/31180/table?page=1&per page=20&q=&sort="https://dane.gov.pl/pl/dataset/1426,liczba-uczniow-cudzoziemcow-wedug-gmin/resource/31180/table?page=1&per page=20&q=&sort="https://dane.gov.pl/pl/dataset/1426,liczba-uczniow-cudzoziemcow-wedug-gmin/resource/31180/table?page=1&per page=20&q=&sort="https://dane.gov.pl/pl/dataset/1426,liczba-uczniow-cudzoziemcow-wedug-gmin/resource/31180/table?page=1&per page=20&q=&sort="https://dane.gov.pl/pl/dataset/1426,liczba-uczniow-cudzoziemcow-wedug-gmin/resource/31180/table?page=1&per page=20&q=&sort="https://dane.gov.pl/pl/dataset/1426,liczba-uczniow-cudzoziemcow-wedug-gmin/resource/31180/table?page=1&per page=20&q=&sort="https://dane.gov.pl/pl/dataset/1426,liczba-uczniow-cudzoziemcow-wedug-gmin/resource/spage=1&per page=20&q=&sort="https://dane.gov.pl/pl/dataset/1426,liczba-uczniow-cudzoziemcow-wedug-gmin/resource/spage=1&per page=1&per pa

Based on the available data, it is quite difficult to estimate the exact numbers of migrants living in the localities. In the case of localities in the proximity of large cities (locality 2 and

^{*}All types of permits: temporary stay, permanent stay, all types of permits for EU citizens.



4), many migrants rent apartments there, despite working in a large city. They prefer to commute daily due to the lower costs of living in small towns. This fact translates into two things, first that they influence the local market with renting houses, buying products from local markets, etc., second that they show little interest in integrating in the local community as their work environment is elsewhere. Namely, their administrative responsibilities lay on the local level but their integration lays on the regional level. This phenomenon of differentiating the place of residence and of work was already noted from the work of Jaskułowski (2019) and was also found in our fieldwork. However, it must be mentioned that this applies solely on the locality Type A, where migrants are commuting for work. Therefore, the socialising aspect is rather focused on the locality where they work and the locality where they live is simply circumstantial for logistical reasons, for instance cheaper rents.

The interviews stemming from the localities 1 and 3 pointed out the **lack of knowledge about migrants living there**: "We do not have exact knowledge about the migrants living in our town. Many of them are not registered in our commune. However, it is clearly visible that there are more and more migrants, they rent flats here, from private owners, send their children to schools. When you go to the local shops you can hear Ukrainian language everywhere" (PL-SWI-01).

The problem of registration is also mentioned by other interviewee "We know exactly that many migrants work in the factories in our municipality. A lot of them are here based on the simplified procedure of employment. These are still temporary migrants, working here for 6 months and then going back to Ukraine. Many of them are registered in other places because they work for the factories via employment agencies. For our authorities it is kind of difficult to register them, we know they are here, but we do not know a lot of information about them. They do not use social services" (PL-OST-13).

This concludes to the fact that the complexity of migrants living in one locality but working to another, leads to a gap in the knowledge and understanding of how to integrate these individuals, when they are lingering between two localities. Them working outside of the locality that they live, limits the interactions with the locals.



4. Overarching themes

4.1 Describing the development of the integration policies

The growing number of economic migrants mainly arriving from neighbouring countries impacted the public debate about the causes and consequences of migration in Poland (Brunarska, Kindler, Szulecka, and Toruńczyk-Ruiz, 2016). Until 2015 migration has never been on the political agenda in Poland and the Polish government had not formulated or adopted a migration or integration policy until then. In 2012 because of cooperation with experts from academia and representatives from the NGOs, the government adopted the strategic document Migration policy of Poland- current state and recommendations (Polityka migracyjna Polski-stan obecny i postulowane działania), which was meant to be a plan for implementation of legal changes planned in the field of migration and integration (KPRM, 2012). After a change of government (from the Civil Platform party to the Law and Justice party), the electoral campaign in 2015 was based on the claim that Poland was facing 'a migration crisis'. It was used to arouse fear that migrants would pose a threat for public order and security (Cywiński, Katner, Ziółkowski, 2019). As a result, the 2012 strategic document was withdrawn and restrictive migration measures (mainly in border control, visas and return procedures) were proposed. Following the political campaign of 2015, the Polish government decided not to accept the relocation of refugees proposed by the European Commission (European Commission, 2015). Poland as a Member State was not affected by the post-2015 refugee migration via the Mediterranean or Balkan route. At the same time, the shortage on the Polish labour market and the demand of foreign labour force resulted in high inflow of migrants from neighbouring countries. This very intense process challenged the local authorities. Interviewees expressed that the period back in 2015 was a shock to stakeholders working with migrants as the previous political party had drafted with them recommendations and policies to improve the settlement and integration of migrants and the change of the government basically instantly cancelled all these attempts. The participant did not mention that the previous governing party had big plans about migration and integration but that they were at least some first steps and with the rejection of these, key actors were left with no central support. Namely a disconnection developed between the national and local level as the national level halted any plans for integration and funding these and the local actors had already planned for the existing migrants which when these were cancelled, they still had to deal with the same problems but at that time with lesser support and understanding from the national level. However, due to the access to the EU funds, NGOs and other organization implemented several integration projects (Matusz-Protasiewicz, 2014). Based on the fieldwork in all 4 localities, it was observed that representatives of the local authorities are



aware of integration needs, but they do not discuss it in detail in the official political fora (city council, committees, etc.). The interviewee mentioned:

"Integration policy at the national level does not exist. After 2014, all the agenda of departments in charge of integration were cancelled. There is one expert in the government for migration. There is no money also, there is no governmental money for NGOS like us or all the NGOS operating in human rights and integration. So, basically, they are supported by money from abroad." (PL-JEL-09)

Actions in the area of migration had been taken ad hoc and concerned various categories of migrants, including activities towards Polish emigrants working in the EU Member States. The most institutionalised policy has been the refugees' policy, elements of which have been focused also on the integration of refugees (e.g., Individual Integration Programs) (Pawlak, 2013).

There are multiple reasons, why the Polish government keeps adopting a position where concrete migration and integration policies seem not to be a priority. After high inflows of labour migrants in the recent years, the Polish government appears to have a stance that this is a type of temporary migration, which due to its short term of stay it does not require any integration activities. Another assumption is related to the cultural proximity of labour migrants coming to Poland, which makes their adaptation quicker and easier. This approach leaves out a bulk of migrants coming from India, Bangladesh, and Pakistan for instance, who are granted long-term visas and are not culturally proximate to the Polish culture but fall in the same category of "labour migrants" as the rest of the migrants and do not receive any integration activities. This makes their settlement harder as they have to navigate by themselves in the Polish society.

In the process of developing integration activities in Poland, NGOs have a significant role. With the use of European funds, they conduct integration initiatives, which compensate for the lack of state actions in this area. The obtaining of European funds by NGOs for integration initiatives is an intrinsic implementation of the vision of integration defined by the European Commission (Pawlak, Matusz-Protasiewicz, 2015). Importantly, these organizations, besides implementing integration activities, also actively participate in (sparse) public consultations at the national, local and European level and work with international organisations, such as IOM or UNHCR; this way they keep an eye on the authorities' actions towards foreigners in Poland. The NGOs have been involved in integration policymaking on national, local and EU level. It is important to add that the NGO's acted in multiple roles in the area of integration.

The cities in Poland have begun the process of developing local integration policies at an extremely difficult moment. The rapid inflow of migrants in Europe has radicalised far-right parties and anti-immigrant movements, which is not conducive to building dialogue and establishing pragmatic solutions in this area. The atmosphere of hostility towards migrants is also prevalent in Poland. The political debate after 2015, portrayed migrants as a threat to national security, sovereignty, and national identity. The Polish government underlined the



need for better border controls and protection against any irregular migration. At the same time, migration, and the inflow of migrants to Poland seemed unavoidable, in light of demographic trends, economic development and resulting labour market demands (Matusz-Protasiewicz, 2016). From 2015 onwards Poland has been on the one hand facing a high inflow of labour migrants, as a result of labour market demands and very liberal approach to this type of migrants. Even if the Polish government takes the position that this is a temporary migration, which does not require any integration policy. The inflow of high numbers of migrants, of which the majority settled down in the cities, has challenged the local authorities, in many areas of social relations. Local authorities in large Polish cities had attempted to create local integration strategies for migrants. Although more and more migrants have settled outside large cities in recent years, small towns have not yet developed their own recommendations and strategies for integration. The fieldwork in all four localities showed that there are migrants living there, but the development of integration activities is in a very early stage, very fragmented and based on individual competences of local authorities' representatives. There is, though, an understanding from all local actors that there is a need to act locally rather than through a centralized system. One of the interviewees mentioned:

"Integration does not happen on the national and international level, regulations happen there and very often, we fine them not being really, what was the word in English, not really matching the needs of the people, who come here." (PL-JEL-09)

Local actors have come to slowly realise that they need to be innovative and engage different kind of actors in the process of integration. In one of the localities, a new initiative, brings together host community and migrants. The idea is that local women will be in couples with foreign women, and they will go around the locality spreading the word of what services and assistance the organisation can offer and ask about local needs from both the receiving society and the migrants. This idea interestingly enough is a collaboration between two organisations: one working with migrants, and another with women. Hence, collaborations exist on the local level between organisations, which are not solely working with foreigners but also other humanitarian and social actors. The interview stated about the Polish women, who participate:

"Local women who are part of our project, super nice women in their 60s, 70s, 50s, already activists, just do not know that they are." (PL-JEL-09) The existing NGOs working in the localities, in general tried to extend their project and activities, to the new target group namely migrants. In some cases, they did not address extra activities to migrants exclusively, but incorporated them to the already existing programs.



4.2 Frames of integration (perceptions, discourses)

As we mentioned earlier, Poland does not have a migration and integration policy on the national level. In the national legislation integration activities solely exist for forced migrants such as refugees or migrants with subsidiary protection. This absence of migration and integration policy is because for many years integration was not seen as a social or political problem in Poland.

In the first official document (Zespół do Spraw Migracji, 2011 p. 68-71) the goal of integration was formulated as enabling immigrants to live independently, allowing them to take advantage of the opportunities offered by the labour market, education and healthcare systems, and have them participate in social life and exercise civil rights, while respecting the cultural and religious needs of those concerned. In this document integration was defined as a **dynamic, two-way process** of mutual adaptation of immigrants and the host community. This approach resembled the definition of integration proposed by the European Commission.

Integration as a political issue was introduced to the public discourse in the parliamentary elections in 2015. The Law and Justice presented migrants as a threat to the public security and Polishness. After the elections, the Law and Justice government pointed out the need for migration to Poland, as a solution for the demand on labour market, and demographic crisis. However, migrants should come from countries culturally close to Poland, in order to avoid tensions, and strengthen their integration. The geographical preferences were expressed in many statements by the representatives of Law and Justice government (Uchwała nr 8 Rady Ministrów). The inflow of migrants was strongly related to the labour market needs.

The important document on integration was made public in the summer of 2019. The draft document 'Poland's Migration Policy' was strongly criticized by representatives of various groups such as experts, academics (Committee on Migration Research of the Polish Academy of Sciences), NGOs. This document defined integration as a part of migration policy. The definitions of migration, integration and related processes were presented with numerous errors, prejudices, and simplifications. The securitization of migration, the aim at protecting Polishness, and the identity was mentioned in the document several times. Integration was replaced by assimilation, understood as a process of full adaptation of foreigners to Polish norms and values, including adaptation to Catholic values. In the documents we read that an 'integrated foreigner understands and recognizes the values in force in Poland, including ideological and religious ones, accepts them and treats them as their own and rejects values that would pose a threat to social cohesion and universal security in Poland' (Zespół do Spraw Migracji, 2019, p. 38). The access to citizenship was in the draft document as well strongly related to assimilation of migrants to the Polish norms and values. In the draft 'Poland's



Migration Policy', integration policy shifted from integration to assimilation, which was one of the main points of criticism by integration expert.

Integration as a concept is not present in the official documents in any of the four locations, however local actors considered immigrant integration as needed:

"We have more and more migrants, they are mainly Ukrainian, but also Pakistani. Ukrainians come here to work. They're mostly men. They work, do groceries, then return to where they are staying. Until now, they have not had many contacts with the locals. Rather, they lived together without many contacts with locals. Of course, we are aware that there is something like integration, and with the growing number of migrants in our community, we will need to do something. There is nothing official. No policy, document, group on the governmental level discussing this. In my personal opinion, integration means that we all have to change. Some labour migrants who worked in our municipality in the last years, seasonally, decided to bring their families. It is in my opinion a new chapter. When they are with families, they send children to school, they probably are going to look for some activities, cultural offer, maybe a social service. And this would be a challenge for our institutions. But now this is not an issue" (PL-SWI-06).

It seems that **integration** as a **two-way process** is **present** in the consciousness of local **policymakers**. They did not gain knowledge about integration from official documents, but rather from the public discourse. Many of them reflected on the public debate on the migration crisis in 2015, and the politicisation of this subject. The media debate about migration and integration challenges in the Western European states was the first time when many of the interviewees heard about this subject.

A deputy from the municipality mentioned: "I started to remember the topic of integration when migrants came to us, meaning mostly Ukrainians. I started to think if they would stay here and what they would need here. The integration has never been a real subject of discussion in Poland. I heard about integration challenges in 2015, in the context of the migration crisis in the EU. At that time, it was a subject of political debate. And for the rightwing media it was presented very negatively. Also, by the politicians of the Law and Justice Party, as well. Migrants were described as a threat, but at the same time more and more labour migrants were allowed to come here and work. I know that this inflow and settlement of migrants here might impact all of us. This can be a challenge and the source of some tensions. But I think we can work together with migrants to develop activities they need most" (PL-SWA-19).

Due to the discussions regarding national security after 2015, there were a lot of political debates. Due to the way that migrants were portrait by some of the national media and their inclusion to society, some of our interviewees were **confused about the differences between integration and assimilation**. Some of them **asked for more state-governed regulations on integration** of the migrants.



A local service provider stated: "I think there is a lot in the media about the problems related to the integration of migrants in the Western Europe, about the ghettos and gangs that are prowling there. We are lucky because our migrants are from neighbouring countries, close to our culture. They learn Polish quickly; they work and do not live using social services. I think when we think about migration policy, our government should think about the clear strategy which we want here and what are our requirements. For me integration means that migrants accept our rules and culture. This is our home, and they are guests here" (PL-JEL-12).

Due to the lack of experiences with integration strategies or policies, the representatives of the local authorities associate integration tasks mainly with education and social services. Hence, education seems to be the most present element in the opinions of all interviewees. This relates to the growing numbers of migrants, who decided to settle down in Poland. It can also be justified that they are mostly aware of the education of foreign students as it is a reappearing pressing issue to accommodate foreign children in Polish classrooms.

A private employer, who provides services to labour migrants regarding their paperwork and assistance with state documents, mentioned: "I think that education is the most important thing if we talk about integration. For migrant children it is important to learn the language and be able to follow the program at school. But it is also important for Polish pupils to learn how to share the space with the others, with people with different backgrounds, cultures, languages, and religions. School is important because it can be a meeting place of children, but also for parents. I have the feeling that our migrants live next to us, there are not many occasions to meet, to build a community together' (PL-SWI-04).

This emphasis on education but not on social services could be explained by the fact that Ukrainian labour migrants are not dependent on social services. Based on data from the Ministry of Family, Labour and Social Policy, there are more than two million Ukrainians in Poland in the labour market. Most of them work in the secondary sector (as plant and machine operators and assemblers). The integration tasks of local authorities, according to our interviewees, are not related to housing, labour market, or health care services, but to culture, intergroup relations and building a sense of belonging. For the local authorities therefore, cultural integration is the most common phenomenon over other types of integration (i.e., political integration). It means that local authorities are free to create their own solutions regarding cultural integration. In the area of education, the interviewees focused on increasing the level of knowledge and strengthening intercultural competences. It came many times that: "Building a sense of social belonging and working on eliminating tensions is important for the local communities" (PL-OST-14).

To sum up, integration seems to be an important concept according to the interviewees representing local authorities, NGOs, local media and employers. The understanding of this concept is not based on the regulations or official documents of public institutions, but rather a common knowledge gained from media and public debates. Some interviewees



spoke about integration but what they were describing largely resembled an assimilationist approach. In some statements these terms were understood as synonyms, blurring the lines of who has the responsibility in integration processes. Notably, integration was reduced to having respect and understanding of the host community's culture, norms and values, and assigning the task of successful integration to migrants themselves. In some localities, efforts were made by local NGOs to exchange knowledge, discuss, and create cultural exchange, but in some other cases integration plans targeted the facilitation for schools, houses, translations but did not include inter-cultural dialogue. Almost all interviewees define migrants as an object of integration policy, and integration tasks, rather than subject of it. Interviewees did not consider migrants as a collective actor that should be include in the development of integration policy.

TABLE 8: Dominant frames in different localities

	Dominant Frames used by local policymakers	Dominant frames used by other actors (might be slit in more columns, distinguishing per different types of actors)
Locality1	Integration	Education, Cultural integration
Locality2	Integration	Education, Cultural inclusion
Locality3	Integration	Education, Cultural integration,
Locality4	Integration	Social services, healthcare, housing

4.3 MLG DYNAMICS IN INTEGRATION POLICY-MAKING

Poland is a unitary state, where public policies are developed on the national level. However, Poland is administratively divided into voivodships, corresponding to regions or provinces in other countries (in Polish: województwo), then into administrative units/districts called *poviats* (in Polish: powiat), and finally into communes (in Polish: gmina). A voivode is the governor of a voivodship in Poland, representing the government in the region. **For the legalization process the regional level is important**. In the governor's offices in the regions departments for foreigners are responsible for legalization of stay in Poland. In the simplified procedure of employment, the local labour offices are important for the permit for work.

As it was mentioned mentioned before the only institutionalized part of integration policies was addressed to those migrants who received refugee status or subsidiary protection in Poland. The so-called 'assistance for a foreigner', which aims to support his/her integration process was related to *poviat* family support center (local level of governance). The centers were responsible for implementation of Individual Integration Program of this specific group.



Conversely, integration governance more generally relies mainly on ad hoc, and rather grassroots initiatives and projects run by NGOs in cooperation with local authorities in Poland.

In the previous chapter on definition of integration we quoted our interviewees and their sources of knowledge in this area. Because of the lack of national regulations, **the actors on local level**, due to the influx of migrants and the arising challenges in integration, **tried to come up with some very basic ideas.**

An expert researching on labour migration in Poland said: "There are not official documents, or any suggestions how we should work with migrants. We try to follow what's going on in big cities, they have already implemented their strategies. Wrocław for example. We have discussed the questions related to migrants in Union of Polish Cities (in Polish: Związek Miast Polskich). But I think the Union of Polish Metropolises (in Polish: Unia Metropolii Polskich)⁸ is much more advanced in cooperation. Migrants in the recent years decided to settle mainly in big cities. They have set up the special committee working on migration and integration. We are following their work and statements because we know that working on integration will be important for medium-sized cities very soon" (PL-SWI-06).

The Union of the Polish Metropolises seems to be very active in the last years as a collective actor in the public discourse on migration and integration. It appears from the interviews that small and medium-sized cities follow the discussion in this group. The recommendations on the integration activities from the Union were important for our interviewees in their primary debates in this area.

There is no doubt that in the governance of integration in Poland, the **role of NGOs** is **very crucial**. NGOs have been acting **as service providers** (financed mainly from EU funds) and **as expert for diver institutions** (actively involved in public discourse). The integration programs provided by the NGOs covered in the last years mainly the big cities, however some NGOs decided to go to medium-sized cities to offer legal advice or other forms of support. "In our case there are some NGOs e.g., NOMADA or Foundation Ukraine which came here to offer their services to our migrants' community. It is great because their [migrants] do not need to go to Wrocław. We think how to teach our local NGOs to work in this new area. This NGOs from Wrocław can help us to develop our own offer. We need to work on it" (PL-SWI-01).

The NGOs with the longest experiences in integration area in 2021 established Coalition of Minority and Migrant Organizations (in Polish: Koalicja Organizacji Mniejszościowych i

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⁸ Unia Metropolii Polskich- union of 10 big cites in Poland, Unia Miast Polskich- union of 365 cities in Poland.



Migranckich), with the aim at exchange of experiences, cooperation in project and other activities.

4.3.1 Actors' functions and their roles in governance networks

Poland as it was said is a unitary state, migration and policies should be developed by the public institutions at the **national level**. However, the process of development and implementation of each public polices never **reached the point of an explicitly formulated strategy or policy**. The process of some institutionalization or regulations in this area was impacted by regulations from the EU level. The **role of EU funds was crucial mainly for NGOs** to set up integration activities.

If we look at the institutions responsible for, as it was said, fragmented migration policy, the Ministry of Foreign Affairs with its diplomatic missions abroad is for issuing entry visas for foreigners, which is the first step to enter Poland legally. Polish Border Guard is responsible for border management and plays an important role in the procedure of asylum and international protection, together with the Ministry of Internal Affairs and Administration. Some procedures of legalization of stay (temporary and permanent permits) are part of the competence of Governor's Offices in the regions (voivodeship). In the simplified procedure of employment of foreigners, the local labour offices play an important role in issuing the permit for work and stay.

The list of state actors dealing with migration and protection/asylum in Poland in recent years is much longer and it also includes such entities as the Ministry of Family, Labour and Social Policy, the Ministry of Investment and Development, the National Labour Inspectorate, the Central Statistical Office and the Refugee Board. In the field of integration activities, the Ministry of Family, Labour and Social Policy should be mentioned, as it provides foreigners with support concerning various social services and deals with their access to the labour market.

As it was already mentioned the public institutions are strongly supported by representatives of integrational organizations such as UNHCR Office in Poland, IOM Country Office in Warsaw, the headquarters of the European Border and Coast Guard Agency (Frontex), National Contact Point in Poland of the European Migration Network.

NGOs working in migration and integration field are based in the big cities, but as it was mentioned already, some of them in the last years also initiated integration activities in medium-sized cities.



It is important to point out that the **local authorities cannot create and implement their own** migration policies or establish services which deviate from the national policies.

General rules regarding immigration, residency or international protection and the situation of foreigners in Poland are regulated by, among others, such legal acts as the Constitution of the Republic of Poland of 2 April 1997, Act of 12 December 2013 on foreigners and Act of 13 June 2003 on granting protection to foreigners within the territory of the Republic of Poland.

Regarding integration policy, national and local level institutions share some responsibilities and local actors have more space to build their own independent solutions. Access to the labour market, education, or social services is regulated by central-level laws including the Act of 20 April 2004 on the promotion of employment and labour market institutions, Act of 12 March 2004 on social assistance, Act of 7 September 1991 on the system of education, Act of 27 July 2005 Law on higher education and many others. Hence, the local level endeavors to cover with local initiatives, assistance with housing, which is not covered by these regulations, help with free Polish classes, intercultural events, etc. Namely, everything related to migration, which is not covered by the national regulations.

In Poland, there are **different actors involved in integration activities** and policies by law, financing, or practice, which can be divided into four main groups:

- intergovernmental organisations: e.g., EU, IOM,
- **central level public administration**: Ministry of the Interior and Administration, Office for Foreigners, Ministry of the Family, Labour and Social Policy, Ministry of National Education, Ministry of Science and Higher Education, voivodship offices,
- **local level public administration**: *poviats* (the largest cities with *poviat* status) and communes, *poviat* family support centers, social support centers (social welfare centers), *poviat* labour offices, primary and secondary schools,
- **NGOs** (mainly in large cities), language schools, local communities, religious organizations, etc.

To sum up, there is **no integration policy on the national level,** there are very fragmented activities covered by the institutions mentioned before. There is **growing role of the big cities** in development of integration activities (Matusz-Protasiewicz and Kwieciński, 2018; Penninx et al., 2014). The example of Gdańsk and Wroclaw integration strategies are frequently mentioned. The aim of this models are integration programs in education, culture, social assistance, housing, counteracting violence and discrimination, local communities, employment, and health.

As mentioned above, the lack of migration and integration policies impacted the local authorities in their activities. At the local level we can observe dispersed integration activities rather than actions executed under a common, long-term policy. The NGOs seem to be the



main actors in shaping integration activities. NGOs were involved in development of first local integration strategies in big cities. From the fieldwork it seems that the lack of integration frame on the national level seems to worry local authorities, confronted with the inflow of migrants to their localities. "It is weird, that anyone knows and see the inflow of migrants to Polish towns, and the government close its eyes and think they can integrate themselves. Ok we can develop our own policy, but they need to tell us it is our responsibility. Without a common frame, regulations it's going to be a chaos. I don't think every town should have the same plan, work in the same area of education, labour market etc., but the general rules should be same. And I worry that if we don't start thinking and discussing the aims of integration, our migrants will not become part of our towns, but they will stay parallel to us" (PL-JEL-10).

4.3.1.1 Dynamics of cooperation and conflict

In the public discourse on migration and integration the year **2015 marked a turning point**, it was related to migration crisis in the EU. Migration related process started to be a main point of parliamentary campaign, and the debates between main political parties: Civil Platform (PO) and Law and Justice (PiS). The discussion on the EU level and the lack of consensus among the EU member states, was used by the Law and Justice to spread the fear and threat among Polish voters. **Kaczyński as a leader of the governing party** stated:

"The Minister of Health should answer because there are issues related to the dangers in this area. (...) After all, there are already symptoms of very dangerous diseases not occurring in Europe for a long time: cholera on Greek islands, dysentery in Vienna, parasites, protozoa. This is not meant to discriminate against anyone, but it is necessary to check" (Gazeta.pl 2015). This statement was spread widely across all media, and it played a key role in creating an atmosphere of fear and danger. The interviewees mentioned this statement and the atmosphere of the parliamentary campaign many times, as a source of politicization of migration discourse in Poland. "I think the campaign in 2015 changed the perception of migration and migrants. It was very brutal and radical, against migrants. There were so many fake articles about the potential risks involved in migration. The statements of many politicians from Law and Justice, Confederation (in Polish: Konfederacja) impacted the creation of moral panic. This very negative picture of migration and narratives became in my opinion an integral part political strategy" (PL-JEL-11).

In the political discourse there were a clear distinction between "good and bad" migrants. The attitude towards receiving migrants depends primarily on the country of origin of them. The representatives of the Law and Justice governance expressed many times the openness



for migrants from neighboring countries such as Ukraine or Belarus, at the same being strongly against migration from other countries (e.g., North Africa).

This politicization of migration was associated by our interviewees with the national level political discussion. A deputy member of the municipality of one of the localities suggested that: "The radical discussion about migration is a part of politics on the national level. I am sure it might impact the attitude towards refugees, but it is not discussed here on the local level, in our local media. I think here we know that migrants are coming here for work, and that we need them. Maybe here in the small cities we are more pragmatic, far from this kind of ideological disputes?" (PL-SWA-19).

Analyses of the local media of the four localities did not cover any conflicts or discussions around migration. It seems to be a marginal subject for the local media. "Migration...not we don't write about this. What should we write about? This people are working here hard and do have many occasions to interconnect with locals. They have long working hours, they live together and when they have free time, they go home to visit families or relatives. I don't recall any issues with migrants here" (PL-JEL-11).

In the Polish case, it is important to note that there are no stages of different integration policies which changed over the years. Organisations working with migrants and with the concept of integration are only a recent phenomenon in the country. The interviewee stated:

"The organisation started 13 years ago and before that there was nothing else." (PL-JEL-09)

Initially, the local administration tried to have full control of the local matters, which means that this brought in some cases competition with private organisations. NGOs are struggling to assist vulnerable groups with accommodation and in some cases, the local councils disagree with their activities, ending up in court cases against local NGOs. The interviewee (locality 1-) said that for years the NGO and the local council were in bad terms and were arguing about the handling of the migrants in the region. However, recently, the situation has significantly changed. This change is due to the continuous influx of migrants, which showed to both sides that collaboration is inevitable and for the wider good of the citizens, exchange of knowledge, is valuable. The interviewee mentioned:

"Lack of trust, we do not trust them, they do not trust us. But recently, cooperation because they know that we are experts on migrant issues. They know that they need us, but we also know that we need them because we want structural changes and we do not want to be only in emergency cases like, where to put them (migrants) for the night." (PL-JEL-09) It appears that local councils when they cannot resolve an issue, they suggest migrants to visit the local NGOS and vice versa.



4.4 Decision-making

The decision-making process in integration governance on the local level is shared among actors representing public institutions and NGOs. In case of our four localities, where the discussion about integration is just about to start, NGOs (originating from big cities) play the biggest role. The local authorities are in an initial stage of policy learning, following the discourse about migration and integration on national level, the outcomes from cooperation of metropolises, and trying to find their own way to come with integration. A university employee, expert on migration in Poland mentioned: "We try to discuss the inflow of migrants to our town, and what should we do. There is no support from national or regional institutions. From the discussion among big cities, we know that there NGOs play important role, so we try to include them into our discussions, in order to learn what are the needs of migrants. I think we can work together" (PL-OST-13).

Even though cities are the biggest receivers of migrants, our respondents surprisingly considered towns as easier locations for integration due to the fact that the population is contained in a smaller area, allowing for more interactions between locals and foreigners than in larger cities. The interviewee mentioned: "In towns integration can happen much faster because people live closer to each other, it is a space aspect, which makes these interactions more often, because you know them personally from school, work and neighbourhood" (PL-JEL-09).

The factors that crucially influence local policymakers are the **connections between the transnational and local and regional levels**. The national level appears to be solely for the admission regulations, employment requirements, legal requirements for legal stay in the territory of Poland and regulations related to the education of children with migrant background. However, these regulations do not impact the integration policies as much as there are no funds and no systematic policy to be followed across the country. Therefore, private and non-private organisations and individuals are mostly taking responsibility for promoting integration and can do so as long as they are not infringing on any laws. They are **using funds from the international level, mainly the EU, and are using spaces available at the local and regional level for events and other activities**.

Having said that, the national level can potentially block initiatives when it comes to providing services like housing. The local NGOS at all localities are endeavoring to assist migrants with housing issues but the government has the opinion that all citizens of Poland should be treated equally, and no special treatment should be allocated to migrants. Therefore, migrants register for social housing in long queues with other Poles and sometimes wait for years to receive social housing The local actors are trying to assist migrants with renting apartments/houses coming from private properties. They help them to find an apartment, with translations of the contracts and all needed papers to legally rent a place in Poland and register it afterwards to the local administration.



TABLE 9: Dominant factors influencing how local policies are decided and acted upon by actors in different localities.

	Factors that crucially influence local policymakers' actions and decisions	Factors that crucially influence the actions/decisions/mobilisation of 'political actors' (e.g., advocacy NGOs, pro-migrant or anti-migrant movements, local councilors from opposition parties etc.)	Factors that crucially influence the actions and decisions of street-level bureaucrats / non-profit service providers / trade unions / private employers /employers' organizations
Locality1	Relations with local council	Poviats and volumes of applications	Demand and supply for the needs of migrants
Locality2	Funds by the EU		Available resources
Locality3	Supporting emergency cases		
Locality4	Relations with regional level		Allowance from the regional center to utilise public and private spaces owned by the regional government for integration activities and temporary accommodation of migrants.



5. Conclusion

Poland the last decade is an emerging country in migration. Particularly, since the country has simplified its system for several neighbouring countries, it is a hub, which accepts thousands of migrants for work. Employment in an EU country does not solely mean applying for work permit, contracts and healthcare but also means access to social services and services for the families of the migrants, as family reunification is a frequent phenomenon. Since 2014 and on, the Polish government has turned its back to systematic changes in integration policies and has placed its focus on regulating migrants' paperwork, minimum wages and access to NFZ (national healthcare) and to public schools for students. However, that covers migrants' economic but not cultural and political integration. For these reasons local actors are starting to grasp the needs of their localities and have come into action to foster primarily cultural integration. Therefore, as discourse analysis and fieldwork for this project has shown, the limited governmental attention to migration related issues and the limited resources have forced local actors to collaborate, exchange valuable experiences and, in most cases, gain the respect from the national level to take actions and decisions for their local needs by themselves. The localities from the Polish case have migrants from similar countries of origin with high numbers of Ukrainians and Belarusians. Each locality has some small numbers of different nationals but until today the localities are very similar when it comes to the newcomers' nationalities.

However, there are specific policies and practices for integration on the local level that are tailored to local needs. For instance, the two localities which fall under the type A category, deal mostly with a mix of skilled and low skilled migrants. These localities have residents who live there but commute to work in larger cities close by, they find employment in offices and companies, which makes their integration programs to be more focused on intercultural dialogue, exchange of ideas, Polish language courses. More generally, they seek making migrants become part of the Polish society. Whereas, in the type B localities the majority of labour migrants fall in the category of low skilled migrants, working in agriculture, construction and factories. The local strategies there are more focused on assisting migrants with finding houses, legalising their papers, providing them with legal advice and helping them with questions about the minimum salaries and working hours in the country.

Either way, localities are the most engaged in the integration of migrants comparing to the regional and national levels. Local public and private actors as well as individuals collaborate for immigrants' social inclusion. Especially, the **period post-2014** in Poland is important to be regarded as it **coincides with the year of Crimean annexation** and large outflows of Ukrainians in Poland as labour migrants and refugees. Certainly, these changes have impacted the local communities and it can be observed that **local councils, mayors, and other policymakers are**



consulting with local NGOS and activists as they realised that local and translocal ties are important for providing solutions to local problems. By translocal solutions we refer to NGOS who are operating in larger cities and are collaborating with local actors in smaller towns, sharing their knowledge and bringing programs that worked in large cities in there. For example, the Ukrainian foundation is operating across Poland and assists one of the type A localities with meetings at the town hall for legal consultations. Hence, the foundation creates networks across localities. Similarly, translocal connections are seen not only with organisations working with migrants but also with organisations working with women's rights. They work together for combined projects, which can benefit society as a whole.

From the research findings, two main characteristics and three differences can be noted. The first common feature is that there is no governmental budget for integration across Poland, therefore, in all localities the funding comes from the transnational level, namely, the EU. For that reason, due to the limited resources, different actors cannot entirely work independently and require the support of the local community with volunteers and the municipality for offering spaces with no charge for certain events. The second feature is that they were all created in the past 15-10 years, which makes them have some experience but at the same time not necessarily much confidence. Therefore, some responses are reactive, some solutions are not well planned, a lot of these actors are experimenting and if a technique works, they spread it to other localities.

The first difference is that across the report, it is discussed that in some localities the actors appear to confuse the terms "integration" and "assimilation". The Polish governmental documents seem to contribute to the confusion as they represent a one-sided approach of an individual fully accepting the values of the nation without necessarily pinpointing an equal effort. It is a more common characteristic of the type B localities, which are recently experiencing larger flows of immigration. In the type A localities, actors are certainly more invested in the idea of mutual efforts. The second difference is that in the type A localities, the local actors underlined the importance of long-term social changes in relation to migration and integration. Namely, they aim for an overall change in the host community's attitudes towards migrants and how they understand the concept of integration. However, in the type B localities emphasis is placed on covering pressing needs of immigrants, like housing, aid to single migrant mothers and lawyers for legal advice. It is not that type A localities have solved this problem, but they do recognise that for instance fundraising for temporary housing and hostels for migrants can be beneficial but that does not change the fact that they do not have certain apartments given to them from the municipalities to assist newcomers having trouble to find a place to stay. Finally, the last difference is that type A localities have moved forward from covering the basic needs for migrants to survive at their communities, like manuals for the towns, help with translations, etc. They are able now to also empower the migrants with intercultural discussions about racism, discrimination and sexism in Poland. An example could be that type A localities are concerned about Ukrainian women, who work as housekeepers, who face sexism and comments about their appearance, when type B localities are mostly interested in them having contracts, knowing their working rights and them having healthcare.



This depicts an evolutionary character from the type A localities, which is due to the more years of experience with migrants, which has given time to the local actors to gain knowledge and the confidence to address sensitive issues like this of sexism.

Overall, considering the multi-level governance tool (MLG), it is quite apparent that in Poland the local level plays a significant role. Particularly, due to the lack of national policies, the local level becomes accountable for the new citizens and the social cohesion and quality of life of the locality. It is also evident that local initiative for labour migrants' integration rely strongly on transnational funding. In case that the transnational level would stop supporting the localities, then labour migrants in Poland will have no support. However, during the last years individuals, private organisations and other activists have shown that they can work together and craft local solutions.

Some recommendations that can be applied for all localities are the following:

- Create forums of discussion for topics related to migration and integration and invite NGOS to take part and share their opinions.
- Define at least at the regional and local level the differences between "integration" and "assimilation". Particularly this has to be done as soon as possible for people, who work with migrants and represent and advocate their rights in Poland.
- Give designated houses from the municipality for migrants who temporarily cannot find a home. These houses will give different actors the freedom to provide some emergency support to those who are in need.
- Give free Polish classes for migrants, these classes should not rely on volunteers and organisations' initiatives solely but in a more structured and continuous format.
- Support more collaborative projects with migrants and host community. The initiative
 with one Polish and one foreign woman, creates networks between women, which
 surpasses the intercultural dialogue and goes towards projects aiming common goals
 as women, in general, for instance.



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